

**IN THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT  
OF ILLINOIS**

**MARK HOFFMAN**, individually and  
on behalf of all others similarly  
situated,

*Plaintiff,*

*v.*

**BCI ACRYLIC, LLC  
D/B/A BATH  
PLANET**

**and**

**NORTHWEST BATH SPECIALISTS,  
LLC D/B/A BATH PLANET OF  
SEATTLE**

*Defendants.*

Case No. 1:25-cv-06107

**DEFENDANT BCI ACRYLIC, LLC.'S MOTION FOR ENTRY OF PROPOSED  
BRIEFING SCHEDULE ON MOTION FOR JUDGMENT ON THE PLEADINGS**

Defendant BCI Acrylic, LLC.<sup>1</sup> submits this Motion Requesting the Court enter the proposed briefing schedule to its Motion for Judgment on the Pleadings, or in the alternative, allow for an additional seven days for the Parties to confer regarding a mutually agreeable schedule. In support, BCI states the following:

1. On October 8, 2025, counsel for BCI attempted to confer with counsel for Plaintiff to prepare a briefing schedule for BCI's Motion for Judgment on the Pleadings.

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<sup>1</sup> As explained in its Answer, BCI Acrylic, LLC is now known as Bath Concepts, LLC. For ease of reference in this motion Defendant BCI Acrylic, LLC n/k/a Bath Concepts, LLC will be referred to as "BCI."

2. Counsel for BCI proposed Plaintiff file a response in twenty-one (21) days, on or before October 29, 2025.

3. Counsel for BCI requested ten (10) days to file its Reply, on or before November 10, 2025.

4. After proposing those dates, Counsel for BCI received an out of office response stating that Counsel for Plaintiff will have limited access to email through October 10, 2025.

5. Counsel for BCI remains open to conferring with Plaintiff regarding a mutually agreeable briefing schedule, and submits this Motion to comply with the Court's standing order on Motions to Dismiss and Briefing Schedules.

Given that the Parties' negotiation is ongoing, Defendant BCI respectfully requests this Court either: (a) enter BCI's proposed briefing schedule, or (b) allow for an additional seven days for the Parties to negotiate a mutually agreeable scheduling order.

Dated: October 8, 2025

Respectfully submitted,

/s/ Ashni B. Gandhi

Ashni B. Gandhi

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that a copy of the foregoing *Motion for Entry of Proposed Briefing Schedule* was served upon all counsel of record via the Court's CM/ECF systems on the 8<sup>th</sup> day of October, 2025.

/s/ Ashni B. Gandhi  
Ashni B. Gandhi